



Working with you to protect the environment of Berkshire County and beyond

January 24, 2008

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Please accept these comments from the Berkshire Environmental Action Team (BEAT) as part of the public comments on ALL the Proposed Timber Harvests of January 2008.

Public Outreach:

First, we would like to thank the Department of Conservation and Recreation (DCR) for trying to reach out to the public in a clear way to solicit feedback on the proposed timber harvests. At the January 17th, 3:00 pm public meeting held in Pittsfield, it was mentioned that DCR is applying for a grant to create outreach and educational material to educate the general public about DCR forestry practices and what they are designed to do. Thank you. We have ask DCR to do this sort of thing at several meetings in previous years, and we are pleased to hear this response. We hope you receive funding, and we look forward to seeing the end product of this effort.

Were the Conservation Commissions of each town or city where harvests will take place notified of the comment period?

Were abutters to the properties where these harvest will take place notified? If not, were abutters within a specific distance notified?

Does DCR maintain an email list of people and organizations who wish to be notified of timber harvests?

Wildlife and Rare Species :

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BEAT was pleased to read in the Forest Resource Management Plans that areas would be designated as High Conservation Value Forest. However, we are sorely disappointed that it appears from the answers to our verbal questions, that DCR has not made any effort to do the necessary studies of rare species and important habitats before proceeding with their timber harvest plans. BEAT believes it is unfair and not useful to ask the Natural Heritage and Endangered Species Program (NHESP) to walk all these proposed timber harvest areas during the public comment period. These state lands deserve carefully evaluation at a minimum the appropriate time of year.

According to Chapter 123 Forest Cutting Practices Act, Section 40. Declaration of policy of commonwealth:

It is hereby declared that the public welfare requires the rehabilitation, maintenance, and protection of forest lands for the purpose of conserving water, preventing floods and soil erosion, improving the conditions for wildlife and recreation, protecting and improving air and water quality, and providing a continuing and increasing supply of forest products for public consumption, farm use, and for the woodusing industries of the commonwealth.

Therefore, it is hereby declared to be the policy of the commonwealth that all lands devoted to forest growth shall be kept in such condition as shall not jeopardize the public interests, and that the policy of the commonwealth shall further be one of cooperation with the landowners and other agencies interested in forestry practices for the proper and profitable management of all forest lands in the interest of the owner, the public and the users of forest products.

BEAT supports well done, sustainable forestry along with large forest reserves. However, to accomplish truly sustainable forestry, one first needs to know what is using the forest before you begin.

1. Have there been rare bird surveys – interior nesting species, neotropical migrants, owls, breeding bird surveys? If so, when and by whom. How was the data recorded? And how does DCR make use of that data in planning its stewardship of these forests?
2. Have there been any rare invertebrate surveys – giant silk moths, butterflies?
3. Have there been any watch-list plant species surveys?
4. Has there been a careful survey of all the vernal pools on state lands?

At the meeting in Pittsfield, the foresters claimed to know where all the vernal pools on their properties are. However, the foresters declined to identify these pools to NHESP for certification. If this information is not properly cataloged, the public cannot be sure that DCR is paying any attention to these Outstanding Resource Waters. In fact, when BEAT suggested that a trail was having an impact on vernal pool habitat, we were told that if the pool was not certified DCR had no obligation to protect it.

Even though we asked the question above, BEAT is keenly aware that there have not been any vernal pool surveys. We will be working this spring to help DCR locate and certify vernal pools in the Berkshires. This came to our attention last spring because an Off Highway Vehicle (OHV) trail at Pittsfield State Forest goes through the habitat of amphibian species that use a vernal pool. The trail creates large puddles which these amphibians breed and lay their eggs in. These eggs are then subjected to OHVs going through the pools, ripping the egg masses apart, and coating the remaining eggs with silt. Even if these puddles could not be viable vernal pools on their own (which is still an open question), the trail is serving as a “sink”, killing off these amphibians.

BEAT is extremely concerned that there has not been scientific study of DCR lands to identify endangered species habitat or vernal pools. BEAT strongly suggests that DCR staff work with non-profit organizations and volunteers to certify all the pools that these foresters know of, and to look for other outstanding resource waters, this spring. BEAT further suggests that DCR should work closely with NHESP to study all their lands for rare species and habitats.

BEAT further suggests that DCR should work closely with the Department of Fish and Game to help implement the Massachusetts Wildlife Action Plan (Comprehensive Wildlife Conservation Strategy). This important document provides a well thought out plan to ensure conservation of our wildlife for future generations. The Department of Conservation and Recreation, as the largest owner of conservation land, should work with the Department of Fish and Game to implement this strategy.

Thank you for considering our comments.

Sincerely,

Jane Winn

Cc: Commissioner Rick Sullivan
Commissioner Mary Griffin
John O'Leary, Coordinator CWCS
Tom French, NHESP
Henry Woolsey, NHESP
Heidi Ricci, Mass Audubon
Matt Burne, Waldon Woods Project
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